

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

*HYUK JIN SEO, individually and on behalf of all
others similarly situated,*

Plaintiff,

-against-

I.P.T NAME AND DESIGN INC. (d/b/a TYCHE
NYC), EUN CHUL SHIN (a/k/a CHRIS SHIN a/k/a
DIEGO SHIN), JOHN AND JANE DOES 1-10, and
XYZ CORPS 1-10,

Defendants.

Civil Action Number
1:19-cv-02202 (JLC)

STIPULATION AND [PROPOSED] ORDER OF DISMISSAL WITH PREJUDICE

The parties in the above-captioned action, through their undersigned counsel, stipulate and agree as follows:

1. No party hereto is an infant or incompetent person for whom a committee has been appointed and no non-party has an interest in the subject matter of the action.
2. The Joint Stipulation of Settlement and Release is fair and reasonable, and adequate to redress Plaintiff's claims in this action.
3. In accordance with Rule 41 of the Federal Rules of Civil Procedure and Cheeks v. Freeport Pancake House, Inc., 796 F.3d 199 (2d Cir. 2015), this action is dismissed with prejudice in its entirety.

4. This Stipulation may be executed in counterparts and facsimile or electronic copies of signatures shall be deemed originals for all purposes.

Dated: June 26, 2020
Bayside, New York

Law Offices of T. Stephen Song, P.C.

/s/ Stephen Song
By: Stephen Song, Esq.
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Dated: June 26, 2020
New York, New York

Levin-Epstein & Associates, P.C.

/s/ Joshua Levin-Epstein
By: Joshua Levin-Epstein, Esq.
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SO ORDERED THIS ____ DAY OF _____, 2020

Hon. James L. Cott
United States Magistrate Judge